



Carla Varriale-Barker
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October 12, 2023

VIA ECF

Honorable Cheryl L. Pollak
Chief United States Magistrate Judge
United States District Court
Chambers Room 1230
Courtroom 13B – South
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**RE: *DORINA SOKOLOVSKY v. OORAH, INC., OORAH CATSKILL
RETREAT LLC a/k/a “THE ZONE,” and GITTIE SHEINKOPF***
Index No.: 1:20-CV-04116
SMSM File No.: 011010.000257

Dear Honorable Justice Pollak:

We represent Defendants Oorah, Inc. and Oorah Catskill Retreat LLC a/k/a “The Zone,” (the “Oorah Defendants”) in the above-referenced matter.

We write to Your Honor and pursuant to *FRCP 45(c)(2)(A)* submit these revised subpoenas to be So-Ordered for service to the following:

1. **Emmanuelle Glazier** – videographer / photographer that worked with plaintiff to produce a YouTube video that has been already disclosed and documents plaintiff’s allegations with respect to this lawsuit (also referenced in plaintiff’s deposition, dated May 24, 2023.) We further seek all communications with this individual in relation to plaintiff, plaintiff’s ex-partner Leah Forster, who plaintiff testified was involved with creating the video, commencing the Beis Din action, and assisted in the preparation of this lawsuit.
 - a. Website: <https://www.emmanuelleglazier.com/about>
 - b. Email: emmanuelleglazier@gmail.com
2. **Rabbinical Court of Givas Hamorah** –Plaintiff commenced a Beis Din action arising out of her allegations against defendants, assisted by Leah Forster, and this

request is for the complete file (including any submissions or transcriptions) of the proceedings.

- a. Address: 6222-23rd Avenue, Brooklyn, New York 11204
- b. Website: <https://givashamorah.org/>

Your Honor had previously so-ordered these subpoenas. However, we have not been able to effectuate service and the date the subpoenas were returnable has now passed.

The Rabbinical Court of Givas Hamorah was served on September 8, 2023. However, with all of the High Holy Days it was problematic to follow-up with it until recently: we are advised it did not receive the earlier subpoena and it requires a new subpoena in order to comply with the same.

Next, we learned Emmanuelle Glazier moved a couple of weeks ago.

As per *FRCP 45(a)(4)*, a courtesy copy of these subpoenas will be provided to counsel for Plaintiff and Co-Defendant prior to being served to the above-mentioned providers.

Thank you in advance.

Respectfully,



Carla Varriale-Barker, Esq.

cc: via ECF

Leander L. James, IV, Esq. ljames@jvwlaw.net
Aaron Twersky, Esq. atwersky@twerskylaw.com

UNITED STATES DISTRICT COURT

for the

Eastern District of New York

DORINA SOKOLOVSKY

Plaintiff

OORAH, INC., OORAH CATSKILL RETREAT LLC
a/k/a "THE ZONE," and GITTIE SHEINKOPF,

Defendants

Civil Action No. 20-CV-04116(DG)(CLP)

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To:

RABBINICAL COURT OF GIVAS HAMORAH
6222-23rd Ave., Brooklyn, NY 11204

(Name of person to whom this subpoena is directed)

☒ **Production: YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: obtain and inspect any and all rabbinical court documents including submissions and any transcriptions of the proceedings in relation to Dorina "Leah" Sokolovsky and/or Gittie Sheinkopf and regarding the Din Torah on 2/7/18.

Place: Segal McCambridge, 777 Third Avenue, Suite 2400, New York, NY 10017	Date and Time: 11/17/2023 10:00 am
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☒ **Inspection of Premises: YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place: Segal McCambridge, 777 Third Avenue, Suite 2400, New York, NY 10017 or at the Rabbinical Court of Givas Hamorah, 6222-23rd Ave., Brooklyn, NY 11204	Date and Time: 11/17/2023 10:00 am
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The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 10/12/2023

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Carla Varriale-Barker

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* Defendants
OORAH, INC., and OORAH CATSKILL RETREAT, LLC aka "The Zone", who issues or requests this subpoena, are:
Carla Varriale-Barker, Esq. - Segal McCambridge, 777 Third Ave., STE 2400, NY, NY 10017, cvarriale@smsm.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

UNITED STATES DISTRICT COURT

for the

Eastern District of New York

DORINA SOKOLOVSKY

Plaintiff

OORAH, INC., OORAH CATSKILL RETREAT LLC
a/k/a "THE ZONE," and GITTIE SHEINKOPF,

Defendants

Civil Action No. 20-CV-04116(DG)(CLP)

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

EMMANUELLE GLAZIER

To:

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: The uncut version and any outtakes from your film "Gittie Kohn Sheinkopf - a survivor's tale. Cautionary tale of from camp experiences." Additionally, all invoices, emails, texts regarding the allegations made by Dorina "Leah" Sokolovsky and/or Leah Forster regarding Gittie Sheinkopf and the Oorah Defendants.

Place: Segal McCambridge, 777 Third Avenue, Suite 2400, New York, NY 10017	Date and Time: 11/17/2023 10:00 am
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☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
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The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 10/12/2023

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Carla Varriale-Barker

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* Defendants
OORAH, INC., and OORAH CATSKILL RETREAT, LLC aka "The Zone", who issues or requests this subpoena, are:
Carla Varriale-Barker, Esq. - Segal McCambridge, 777 Third Ave., STE 2400, NY, NY 10017, cvarriale@smsm.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).